

## **THE SUPPORTING STATEMENT**

### **Justifications**

#### **1. Circumstances Making the Collection of Information Necessary**

##### **Statutory Authority**

Immigration and Nationality Act § 412(c)(1)(A), 8U.S.C. § 1522(c)(1)(A) and § 412(a)(4)(A)(i), 8 U.S.C. §1522(a)(4)(A)(i).

The United States resettles thousands of refugees every year. Some of these refugees have many positive business attributes including a vast array of business ideas, experience, training, and a strong desire to succeed in the U.S.A. As a result, many of these refugees want to start their own business as an alternative to employment. Unfortunately, they cannot fulfill their dreams of owning a business because they do not have the capital that is needed. Also, they cannot borrow from the traditional lending sources due to their inability to meet the stringent criteria of the traditional lenders. It was precisely to overcome this challenge that Office of Refugees Resettlement (ORR) in the Administration for Children and Families (ACF) within the Department of Health and Human Services established the Microenterprise Development (MED) program. The MED program is a discretionary grant program. It was established to 1) assist refugees in becoming economically self-sufficient, 2) assist refugee serving communities galvanize resources to strengthen their capacities to expand and continue their microfinance services at an expanded and sustainable level, and 3) enhance the integration of refugees to the mainstream and realize the American Dream. It is critical to collect data so as to determine whether or not the program is achieving its intended goals.

#### **2. Purpose and Use of the Information Collection**

Grantees are required to submit a semi-annual progress report. In general, the report shows a comparison of actual achievements and goals in certain areas like the number of people enrolled in the project, the number of hours of technical assistance provided, the number and amounts of loans made, the amount of funds leveraged from other sources, and the number of jobs created/retained as a result of the project. A large portion of the grant is used for technical assistance including hiring staff members such as loan officers and outreach persons. One of the tasks of these staff member is to collect, manage, and report the data.

The data has many uses. ORR uses the data to measure the implementation progress of the projects. Management and project staff, both in ORR and grantee, use the data to ensure that progress is being made toward achieving the grant's objects, goals, and targets. ORR uses the data to ensure that the Federal grants are being expended for the intended purposes. Since the data shows the strengths and weaknesses of the performance of the grantee, it is used to address the concerns, issues, or difficulties the grantee may have in implementing the project. Last but not least, ORR uses the data for various management decisions as well as in writing its Annual Report to Congress.

#### **3. Use of Improved Information Technology and Burden Reduction**

Increasingly, ORR is becoming paperless to save cost. All of the ORR MED grantees have a database that they use for case management, data collection, analysis, management and reporting. Thus, the information requested is collected and reported to ORR electronically by uploading it in Grant Solution on semi-annual basis. ORR downloads the data from Grant Solution as and when required.

#### **4. Efforts to Identify Duplication and Use of Similar Information**

No similar data is being collected and reported to ORR. As a result, the data thought is not available elsewhere.

#### **5. Impact on Small Businesses or Other Small Entities**

To minimize the burden on the respondent, the data requested is held to the bare minimum required for the intended purpose by limiting the data points to a maximum of eight and requiring on a semi-annually, only twice per year, basis.

#### **6. Consequences of Collecting the Information Less Frequently**

Failure to collect this information less frequently may seriously jeopardize the ability of ORR to ascertain that its MED projects are meeting their goals by addressing challenges the grantees are experiencing on a timely basis.

#### **7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

Some of the information collected and held by the MED grantees may fall under the Privacy Act Authority. The information is necessary to determine eligibility for service under the project.

#### **8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency**

No comment was received in Response to the Federal Register Notice.

#### **9. Explanation of Any Payment or Gift to Respondents**

Respondents do not get compensation for completing these forms.

#### **10. Assurance of Confidentiality Provided to Respondents**

Under 45 C.F.R. 211.14 and 212.9 and state and federal laws, the disclosure of personal and private information is prohibited except under circumstances identified within the program regulations. Besides, the data that is reported to ORR on a semi-annual basis does not contain any confidential and/or private information.

#### **11. Justification for Sensitive Questions**

No sensitive data (information) will be collected.

#### **12. Estimates of Annualized Burden Hours and Costs**

The following are the two categories of the Refugee Microenterprise development program:

A. The Refugee Microenterprise Development Program

B. The Refugee Home-Based Child Care Microenterprise Development Group

Instrument	Number of Respondents	Number of Responses per Respondents	Average Burden Hours per Respondents	Total Burden Hours
Refugee Microenterprise Development Program	22	2	4	176
Refugee Home-Based Child Care Microenterprise Development Program	23	2	4	184
Total Burden				360

The Opportunity Cost: Total burden hours (360 hours per year x \$30 per hour is) \$ \$10,800.

Explanations:

The Refugee Microenterprise Development Program

- Currently, there are twenty two grantees (respondents) in the program and the semi-annual progress report, which includes the data and information required, is submitted twice per year.
- The request covers one form (Form I. attached) which includes eight data points. Based on experience (the information was provided by technical assistance service provider in the past), it takes about two hours per respondent per six months (i.e., four hours per year per grantee (respondent) or 176 hours per year for all respondents) to complete the form.
- No survey will be undertaken since the collection of this data (information) is part of the implementation process of the project and its collection and reporting does not constitute a separate and additional cost to the grantees (respondents). The cost is covered by the grant the grantee receives from ORR. The grantees have Down Home database which captures and stores the data required for reporting. The grantee uploads the semi-annual report in Grant Solution where it is stored. ORR derives the data it requires for management decision and reporting from Grant Solution.

The Refugee Home-Based Child Care Microenterprise Development Group

- Currently, there are twenty three grantees (respondents) in the program and the semi-annual progress.
- The request covers one form (Form II. attached) which includes seven data points. It takes about two hours per respondent per six months (i.e., four hours per year grantee (respondent) or 184 hours per year for all respondents) to complete the form.
- The collection of this data (information) is part of the process and its collection and reporting does not include separate and additional cost to the grantees (respondents). The cost is covered by the grant the grantee receives. The grantees have database which captures and stores the data required for reporting. The grantee uploads the data required in Grant Solution where it is stored. ORR derives the data it requires for reporting and management decision from Grant Solution.

### **13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers**

According to the Bureau of Labor Statics (BLS) Occupational Outlook 2016-2017 Edition, the median annual salary for a Loan Officer (who collects and reports the data) is \$63,430 year or \$30 per hour. Thus, the total cost burden of collecting the data to the respondents is (360 hours x \$30 per hour) \$10,800.

### **14. Annualized Cost to the Federal Government**

It will take about eight hours for the MED Program Manager to compile the data to a spreadsheet from the Semi-Annual Reports. Thus, the total cost burden of this task to the federal government is about (8 hours x \$60 per hour) \$480 per year.

### **15. Explanation for Program Changes or Adjustments**

This is a new request for authorization to collect data.

### **16. Plans for Tabulation and Publication and Project Time Schedule**

Data and information collected under this project is not intended for publication.

### **17. Reason(s) Display of OMB Expiration Date**

The MED Projects have a five year project period. Thus, the current project cycle will expire on September 29, 2021. The OMB expiration date for the data and information reported will be displayed on the forms.

### **18. Exceptions to Certification for Paperwork Reduction Act Submissions**

No exception is requested.

